4.8 LAND USE, PLANNING, AND RECREATION

This section details the existing land use, planning, and recreation conditions in the vicinity of the proposed Project site, outlines applicable land use plans and policies, and summarizes potential land use, planning, or recreation impacts and MMs associated with the proposed Project.

Information in this section is primarily based on the:

- City of Goleta GP/CLUP Land Use, Open Space, and Conservation Elements;
- City of Goleta Coastal Zoning Ordinance;
- City of Goleta GP/CLUP EIR; and
- Santa Barbara County Comprehensive and Coastal Plans.

This section also summarizes and incorporates by reference the conclusions of the EMT EIR and summarizes these conclusions and relevant information where applicable. This document also incorporates data from Santa Barbara County 01-ND-34 and city of Goleta 06-MND-001.

4.8.1 Environmental Setting

Project Site

The Project site is located in Santa Barbara County in the city of Goleta, just south of the Sandpiper Golf Course, east of the Bacara Resort north of the Pacific Ocean, and west of the Ellwood Mesa Open Space. As shown in Figure 4.8-1, primary jurisdiction over the project is shared by the CSLC and Santa Barbara County. Additional agencies with permit authority over portions of the Project would include Santa Barbara County and the California Coastal Commission. The majority of the Project that is located below the mean high tide line (including the caissons, wells, drilling and re-injection equipment) is under the jurisdiction of the CSLC, while portions of the Project located above the mean high tide line (including the piers, pipelines, access road, and possibly portions of the caissons) are under the jurisdiction of the city of Goleta.

FIGURE 4.8-1. JURISDICTIONAL LAND USE MAP

Land Use and Zoning Designations

PRC 421

As stated above, the PRC 421 wells and caissons are primarily under the jurisdiction of the CSLC as all or most of these facilities are located below the mean high tide line[1]. Land surrounding the piers that is above the mean high tide line is within the city of Goleta and is designated as a Coastal Open Space/Passive Recreation area by the city of Goleta Land Use Element and is zoned as Recreation by the city's Coastal Zoning Ordinance (City of Goleta 2006b; City of Goleta 2006c). Figure 4.8-2 summarizes zoning in the Project vicinity. While the PRC 421 piers are not used for recreational purposes, the site is surrounded by recreational uses including the Sandpiper Golf Course, the Bacara Resort, and by Ellwood and Haskell's beaches, which serve as major public coastal access points and are frequented by beach goers, joggers, surfers and walkers (City of Goleta 2006c). The EOF and Sandpiper Golf Course are designated as Coastal Recreation and zoned Coastal Open Space/Active Recreation. The Bacara Resort is designated as Commercial Visitor-Serving by the Goleta GP/CLUP and is zoned C-V, Resort/Visitor Serving Commercial (City of Goleta 2006b; City of Goleta 2006c).

Associated Facilities

EOF: The EOF is zoned Recreation and has been a legal nonconforming use since implementation of this designation in 1991 (City of Goleta 2006b; City of Goleta 2006c).

EMT: The offshore portion of the EMT is under the regulatory jurisdiction of the CSLC. The onshore portion of the EMT is located within the Coastal Zone of the State of California, on unincorporated Santa Barbara County land owned by UCSB. The 17.5-acre parcel is south and east of the city of Goleta. Although owned by an independent State agency, the University of California and the 17.5 acres containing the EMT are under the permit jurisdiction of Santa Barbara County as these lands are used for oil storage and transportation and are not currently used for UCSB-related uses (CSLC 2006).

[1] The mean high tide demarcates the jurisdiction boundary between local governments such as the city of Goleta and the inter-tidal or offshore waters under jurisdiction of the CSLC. Determination of the mean high tide line requires a survey which has not been performed to date. For that reason, the precise boundary between State and local jurisdiction is unclear.

FIGURE 4.8-2. ZONING IN PROJECT VICINITY

Line 96: The proposed Project would also utilize the existing Line 96 and EMT for crude oil transportation, but none of the proposed actions would require modifications which would affect those facilities. Line 96 runs from the EOF north to Hollister Avenue, and eastward along Hollister Avenue to the EMT where crude is stored in tanks. Line 96 is located primarily within the city of Goleta with limited portions located in areas under county jurisdiction. This segment includes a recently installed pipeline leak detection system. The EMT is located within the jurisdiction of Santa Barbara County (CSLC 2006) (see Figure 4.8-1).

Recreation

The Project site is located in a region that offers a wealth of recreational opportunities, due to its natural beauty, undeveloped beaches and open space, topography, and climate (Figure 4.8-3). PRC 421 is located on the beach, just east of the Bacara Resort, the only beachfront resort in the city of Goleta, and due south of Sandpiper Golf Course, which is open to the public. Sands Beach, the UCSB's Coal Oil Point Reserve and open lands and the Ellwood Mesa Open Space and associated five coastal access points, are all located east of and within 2 miles of the site. These undeveloped open spaces and beaches are major coastal recreational areas used by thousands of beach goers annually. The EMT is surrounded by these heavily used public open spaces and beaches. The combination of the miles of beach front, varied ecological habitats, and scenic ocean and mountain vistas attracts many visitors to the area. This is a heavily used, passive recreation area that provides high quality recreational opportunities to the inhabitants of the surrounding areas, as well as of the greater Santa Barbara area and beyond. Passive recreational activities currently take place over most of the area that is accessible to the public.

The primary recreational activities that currently take place in the vicinity of PRC 421 include walking, jogging, picnicking, wildlife viewing, mountain biking, horseback riding, sun bathing, swimming, surfing, surf fishing, dog walking, bird-watching, and photography. Additional recreational resources in the Project vicinity are maintained and operated by a number of entities, including Santa Barbara County, city of Goleta, and private providers.

City of Goleta Parks and Open Spaces

The city of Goleta is responsible for 16 public parks, four private parks and open space areas, and 18 public open space areas, which total 526 acres. The three larger city-owned regional open space preserves—the Sperling Preserve and Santa Barbara

FIGURE 4.8-3. RECREATIONAL USES IN THE PROJECT VICINITY

Shores Open Space, which together comprise the Ellwood Mesa, and Lake Los Carneros Natural and Historical Preserve—collectively account for 363 acres. Approximately 40 percent of the city's 2.0 miles of Pacific shoreline is in city ownership (City of Goleta 2006c). The Santa Barbara Shores Park is located due east of Sandpiper Golf Course and the Sperling Preserve adjacent to the eastern boundary of the park, approximately 0.8 miles east of the Project site (City of Goleta 2006c).

Golf Courses

There are two golf courses in the immediate vicinity of the Project area: the 67-acre, nine-hole Ocean Meadows Golf Course, located approximately 1,200 feet north of the EMT, and the 200-acre, 18-hole Sandpiper Golf Course, located due north of and adjacent to the Project area; both courses are open for public use (CSLC 2006).

Little League

The Goleta Valley Little League operates on Girsch Fields adjacent to the Camino Real Marketplace. These facilities are at the intersection of Pacific Oaks and Phelps Road (CSLC 2006).

Equestrian Facilities/Opportunities

The Santa Barbara Shores Park currently provides an entry point for equestrian use for the system of interconnected trails in the Ellwood-Devereux open space area (CSLC 2006).

4.8.2 Regulatory Setting

Federal

The Federal Coastal Zone Management Act (CZMA) of 1972, as administered by the State of California through the California Coastal Act, applies to this Project. There are no Federal regulations, authorities, or administering agencies that regulate land use or that are specifically applicable to recreational resources with respect to the proposed Project.

State

CSLC

The CSLC manages certain lands held in trust for the people of California. Their jurisdiction includes a 3-mile-wide section of tidal and submerged land adjacent to the

coast and offshore islands, including bays, estuaries, and lagoons; the waters and underlying beds of more than 120 rivers, lakes, streams, and sloughs; and 585,000 acres of school lands granted to the State by the Federal government to support public education. The CSLC is comprised of four divisions: Environmental Planning and Management; Land Management Division; Marine Facilities Division; and Mineral Resources Management. The CSLC is responsible for implementing a variety of State regulations for activities affecting these State Trust Lands, including implementing the CEQA.

California Coastal Act

The California Coastal Act (California PRC sections 30000 *et seq*.) was enacted by the State Legislature in 1976 to provide long-term protection of California's 1,100-mile coastline for the benefit of current and future generations. Section 30001.5 states that the goals are to:

(a) Protect, maintain, and where feasible, enhance and restore the overall quality of the coastal zone environment and its natural and artificial resources;

(b) Assure orderly, balanced utilization and conservation of coastal zone resources, taking into account the social and economic needs of the people of the State;

(c) Maximize public access to and along the coast and maximize public recreational opportunities in the coastal zone consistent with sound resources conservation principles and constitutionally protected rights of private property owners;

(d) Assure priority for coastal-dependent and coastal-related development over other development on the coast; and

(e) Encourage State and local initiatives and cooperation in preparing procedures to implement coordinated planning and development for mutually beneficial uses, including educational uses, in the coastal zone.

The Coastal Act mandates that local governments and constitutional entities prepare a land use plan and schedule of implementing actions to carry out the policies of the Coastal Act. The policies constitute the standards used by the California Coastal Commission (CCC) to determine the adequacy of local coastal programs and the permissibility of proposed development. In the area primarily affected by the proposed Project, Santa Barbara County has a certified LCP and the county and CCC would utilize these standards in review of the portion of the Project in unincorporated areas.

However, the recently incorporated city of Goleta does not yet have a certified LCP. As such, if the proposed Project is considered by the CCC prior to certification of the proposed coastal elements of the Goleta GP/CLUP, the CCC would utilize Coastal Act standards in its review and permitting of the Project. Table 4.8-1 summarizes some of the California Coastal Act policies as they relate to the proposed Project.

Local

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan guides development within the county through 13 elements (seven mandated by State law, six optional) and the Land Use Development Code, six adopted community and area plans, and over 20 major implementation plans to ensure that adopted goals, objectives, and action plans are actually carried out. Four separate zoning ordinances also play a key role in providing detailed guidance on implementing the Plan. Substantial public involvement is emphasized in the drafting and adoption of all of these elements, community plans and implementing documents. The Goleta Community Plan and the County of Santa Barbara Land Use Development Code are applicable to this Project (CSLC 2006).

Goleta Community Plan

The Goleta Community Plan provides development policies, including the general type and location of land uses, specifically tailored for the unincorporated Goleta area and identifies measures to implement those policies. All development within the unincorporated Goleta area must comply with the policies set forth in the Goleta Community Plan. In addition, those portions of the Goleta Community Plan located within the coastal zone have also been incorporated into Santa Barbara County's Local Coastal Program. These standards would generally govern secondary elements of the Project such as the EMT which lie under county permit jurisdiction (CSLC 2006).

Santa Barbara County Local Coastal Program

The LCP contains principle land use policies for development within the coastal zone in Santa Barbara County. This program, pursuant to requirements of the California Coastal Act (section 30108.5), contains the relevant portion of a local government's general plan, or local coastal element, which indicates the kinds, location, and intensity of land uses, the applicable resource protection and development policies, and a listing of implementing actions. The county's LCP first came into effect in 1982, and has been

Table 4.8-1. California Coastal Act Policy Summary

Policy	Relationship to Project
PRC 30230 Marine resources shall be maintained, enhanced, and where feasible, restored. Special protection shall be given to areas and species of special biological or economic significance. Uses of the marine environment shall be carried out in a manner that will sustain the biological productivity of coastal waters and that will maintain healthy populations of all species of marine organisms adequate for long-term commercial, recreational, scientific, and educational purposes.	The Project is located in an area of special biological importance with identified marine resources including kelp beds, rocky intertidal habitat, and three coastal estuaries. Primary issues of concern affecting these resources include the potential for oil spills from the caisson and from off shore tanker loading and transport operations. Project construction could also affect marine water quality through mobilization of sediments and potential release of contaminated materials.
PRC 30240 (a) Environmentally sensitive habitat areas (ESHAs) be protected against any significant disruption of habitat values, and only uses dependent on those resources shall be allowed within those areas. (b) Development in areas adjacent to environmentally sensitive habitat areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas, and shall be compatible with the continuance of those habitat and recreation areas.	There are several ESHAs in the vicinity of the proposed Project, including the Devereux Slough, Bell and Tecolote Creeks, two small wetlands adjacent to the access road, snowy plover habitat near Coal Oil Point, kelp beds, and rocky intertidal areas, and all areas below the mean high tide line. Primary issues of concern affecting these resources include the potential for oil spills from the caisson, offshore tanker loading and transport operations, and pipelines. Project construction could also affect the two small wetlands.
Section 30211: Development not to interfere with access. Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.	The Project is located in an area of moderate to heavy public beach use. This public beach access could be intermittently impacted during construction activities if the public was not allowed to pass under or in front of the structure for public safety reasons. The resulting development would not interfere with the public's right of access to the ocean or beach area.
Section 30232: Oil and hazardous substance spills Protection against the spillage of crude oil, gas, petroleum products, or hazardous substances shall be provided in relation to any development or transportation of such materials. Effective containment and cleanup facilities and procedures shall be provided for accidental spills that do occur.	The Project site is located in an area prized for public recreation and that also supports numerous ESHAs. Implementation of the Project would result in a small increase in the likelihood of a release of oil from PRC 421 as well as one related to tankering and pipeline operations which could adversely impact recreational activities and biological resources. However, production from PRC 421 could reduce the potential for small incremental oil releases from old, improperly abandoned sub-sea oil wells as the pressure in the reservoir appears to be rising since production was shut terminated in 1994
Section 30250: Location; existing developed area. (a) New residential, commercial, or industrial development, except as otherwise provided in this division, shall be located within, contiguous with, or in close proximity to, existing developed areas able to accommodate it or, where such areas are not able to accommodate it, in other areas with adequate public services and where it will not have significant adverse effects, either individually or cumulatively, on coastal resources.	The Project is located in an area that was historically developed and is located on a site where oil and gas development has taken place since 1928.
Section 30251: Scenic and visual qualities. The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.	The Project would add components to the existing facilities that could change the scenic and visual qualities of the area; however, the proposed development would consist of minor alternations to the existing development and therefore be generally compatible with the character of the area.
Section 30262: Oil and gas development. a) Oil and gas development shall be permitted in accordance with Section 30260, if the following conditions are met: (1) The development is performed safely and consistent with the geologic conditions of the well site. (2) New or expanded facilities related to that development are consolidated, to the maximum extent feasible and legally permissible. (5) The development will not cause or contribute to subsidence hazards unless it is determined that adequate measures will be undertaken to prevent damage from such subsidence.	The recommissioning of PRC 421 would return oil and gas production to the immediate project area. This development would be subject to regulation to ensure safety and consistent with geologic conditions of the site, and would not contribute to a subsidence hazard.

revised periodically to update policies. The CLUP represents one component of the LCP, which also includes the Land Use Maps of the Coastal Zone, the Coastal Zoning Ordinance (codified as Article II of Chapter 35 in the Santa Barbara County Code), and the Coastal Zoning Maps (CSLC 2006).

The county has incorporated numerous goals and policies into the LCP to ensure conformance with California Coastal Act policies. In general, Santa Barbara County's policies strongly encourage shipment of oil via pipeline and discourage use of tankers or trucking due to safety related concerns and the potential higher frequency of spills front these methods of transport. While the EMT is "grandfathered in" as an existing marine terminal, the purpose and intent of County oil transportation policies are to ship oil by pipeline wherever possible and phase out marine transportation over the long term As noted below, city of Goleta polices also reflect this County emphasis. Some of the most recent of these amendments are intended to update the county's oil transportation policies to bring the policies and ordinances into accordance with present-day circumstances and into consistency with current California law, including the amendments to the California Coastal Act contained in Assembly Bill 16 (AB 16), which was adopted in 2003. These amendments would revise several sections of the Coastal Plan and Land Use Element of Santa Barbara's Comprehensive Plan, and sections of the Coastal and Inland Zoning Ordinances (Articles II and III, Chapter 35, Santa Barbara County Code); however, these amendments have not yet been certified by the CCC (CSLC 2006).

Santa Barbara County Coastal Zoning Ordinance

Santa Barbara County's Coastal Zoning Ordinance sets forth detailed regulations governing land use and development in the unincorporated portions of the county's Coastal Zone. The Coastal Zoning Ordinance describes numerous zone districts, including coastal recreation, which is applied to the EMT, and describes allowable uses, development standards, and permitting provisions. Division 10, section 35-160 (*et seq*.) of the Coastal Zoning Ordinance prescribes what changes and activities may occur to a legal, non-conforming facility. The intent of this section is to permit non-conforming uses to continue until they are removed, but not to encourage their survival. In addition, subject to very limited exceptions, its intent is to prevent non-conforming uses and structures from being enlarged, expanded or extended, or being used as grounds for adding other structures or uses prohibited elsewhere in the same district. Section 35-161.7 states that the need may exist to improve the safety or reduce the environmental effects of certain non-conforming industrial uses by allowing minor changes that could

result in minor enlargements, extensions, expansions or structural alterations. A Limited Exception Determination may be granted for minor changes provided that the improvement (CSLC 2006):

- Has a demonstrable public health and safety or environmental benefit;
- Does not result in any new unmitigated significant environmental impacts;
- Does not result in an increase in the overall intensity of use beyond the existing permitted use;
- Does not extend or expand the existing developed industrial site boundary within a parcel;
- Does not result in an expansion or extension of life of the non-conforming use due to increased capacity of the structure, or from increased access to a resource, or from an opportunity to increase recovery of an existing resource. Any extension in the life of the non-conforming use affected by the improvement results solely from improved operational efficiency and is incidental to the primary purpose of improving public health and safety or providing an environmental benefit;
- Does not allow for processing of new production; and
- If prior Limited Exception Determinations have been made for the same non-conforming use under this section, the successive Limited Exception Determinations cumulatively provide a public health and safety or environmental benefit.

Santa Barbara County Land Use Development Code

The Santa Barbara County Land Use and Development Code, adopted January 2007, constitutes a portion of Chapter 35 of the Santa Barbara County Code. This Code carries out the policies of the Santa Barbara County Comprehensive Plan and Local Coastal Program by classifying and regulating the uses of land and structures within the County. The Land Use Development Code describes numerous land use zones, including Coastal Zone, Oil and Gas Facilities, which applies to the EMT, and describes allowed uses and permitting provisions. However, the Coastal Zone portions of the Land Use Development Code must be certified by the CCC, which is expected in early 2008. Until the Coastal Zone portions are certified Article II (Coastal Zoning Ordinance) is still in effect.

Chapter 35.51 of the Land Use Development Code describes the permits and development standards for oil and gas facilities in the Coastal zone. Onshore processing facilities (such as the EMT) are allowed only in zone M-CD (Coastal

Dependent Industry) and M-CR (Coastal Related Industry) with a conditional use permit and are not allowed in these zones if the land is an already established "Environmentally Sensitive Habitat" area or if the facility is on or adjacent to the sea.

City of Goleta GP/CLUP

The Goleta GP/CLUP governs land use and physical development within the city limits. The GP/CLUP, which was adopted on October 2, 2006, is currently the subject of litigation but remains in effect at this time. The Coastal Zone portions of this GP/CLUP have not yet been certified by the CCC and may be considered for certification by the Commission in 2007 or 2008. The Goleta GP/CLUP includes elements that contain policies to guide development while protecting the natural resources within the city and the integrity of the city itself (City of Goleta 2006c). Elements of the Goleta GP/CLUP governing land use at the project site include:

Land Use Element – The Land Use Element consists of a policy statement and a land use plan map showing the spatial distribution, location, and extent of lands designated for housing, business, industry, open space, agriculture, and other categories of public and private uses of land.

Open Space Element – The Open Space Element ensures that Goleta recognizes that open space land is a limited and valuable resource that must be conserved wherever possible and establishes policies to protect open space in the city.

Conservation Element – The Conservation Element addresses conservation, development, and use of natural resources, including water, creeks, soils, wildlife, and other natural resources. Population growth and development generally require the consumption of both renewable and nonrenewable natural resources. One role of the Conservation Element is to establish policies that reconcile conflicting demands placed on natural resources and define the balance sought between managed use and preservation of resources

Visual and Historic Resources Element – This element establishes policies to protect scenic resources and established development standards to protect view sheds.

Key policies from these elements of the Goleta GP/CLUP and their relationship to the proposed Project are summarized in Table 4.8-2.

Table 4.8-2. Goleta GP/CLUP Policy Summary

Policy	Relationship to Project
Land Use Element	
LU 1.7 New Developments and Protection of Environmental Resources. Approvals of all new development shall require adherence to high environmental standards and the preservation and protection of environmental resources, such as environmentally sensitive habitats, consistent with the standards set forth in the Conservation Element and the City's Zoning Code.	There are several ESHAs near the location of the Project including Bell Creek, Tecolote Creek, two wetland areas adjacent to Sandpiper Golf Course, snowy plover habitat, and all areas located below the mean high tide line. Accidental oil releases could adversely affect these critical environmental resources. Implementation of the proposed Project would incrementally increase the potential for such accidental releases and lead to exposure of these important environmental resource to damage from such accidental releases
LU 6.2 Open Space/Passive Recreation. This use category is intended to identify and reserve areas with significant environmental values or resources, wildlife habitats, significant views, and other open space values. It may be used to designate both private and public open space areas. The category includes areas reserved for natural drainage courses that may be managed as part of the City's storm water management program.	Although, the industrial uses at PRC 421 are not compatible with the intent of the recreation designation, the portions of the Project within the city's jurisdiction comprise a legal non-conforming use, see LU 9.2 below.
Policy LU 10: Energy-Related On- and Off-Shore Uses Objective: To promote the discontinuation of onshore processing and transport facilities for oil and gas, the removal of unused or abandoned facilities, and the restoration of areas affected by existing or former oil and gas facilities within the city.	The proposed Project would extend the life of currently non-producing PRC 421 facilities for approximately 12 additional years, through 2019 or later.
LU 10.1 Oil and Gas Processing Facilities. The following standards shall apply to oil and gas processing facilities: a. The city supports county policies regarding consolidation of oil and gas processing in the South Coast Consolidation Planning Area at Las Flores Canyon… No new oil and gas processing facilities shall be permitted within Goleta. b. The Venoco EOF site is an inappropriate location for processing of oil and gas because of the public safety and environmental hazards associated with this type of use… c. The EOF shall continue to be subject to the rights and limitations applicable to nonconforming uses under California law. No modifications or alterations of the facility or other actions shall be authorized that would result in the expansion of the permitted throughput capacity of the EOF… d. Until the EOF use is terminated, the priority shall be to insure that the facility strictly meets or exceeds all applicable environmental and safety standards.	Project activities would largely be defined as separation; however, parts could be classified as processing. As a result, the proposed Project would contribute to consolidation of processing at Las Flores Canyon and could be defined as having some elements of a new processing facility within Goleta. a) The project would not involve construction of new oil and gas processing facilities. b) The project would not result in modifications or alterations to the facility that would result in the expansion of the permitted throughput capacity of the EOF c) The project would include measures to meet all applicable environmental and safety standards.
LU 10.3 Oil and Gas Transport and Storage Facilities. The following shall apply to oil and gas transport and storage facilities within the city: a. New oil and gas pipelines and storage facilities, except for transmission and distribution facilities of a Public Utility Commission (PUC) regulated utility, shall not be approved within the city unless there is no feasible or less environmentally damaging alternative location for a proposed pipeline. b. In the event that extended field development from Platform Holly is approved, the City supports the processing of oil and gas production at the South Coast Consolidation Planning Area at Las Flores Canyon. c. Unused, inactive, or abandoned pipelines as of 2005, including the remnants of the Arco pipeline, shall be required to be decommissioned. d. Existing pipelines that were actively used as of 2005 shall be decommissioned as part of and concurrent with the decommissioning of the related oil and gas facilities.	Under the proposed Project, after decommissioning of the EMT in 2016, the proposed 10-inch pipeline extension connecting the EOF to Las Flores Canyon would be utilized, if the pipeline is constructed under the Ellwood Full Field Development project.

Table 4.8-2. Goleta GP/CLUP Policy Summary (continued)

Policy	Relationship to Project
Land Use Element (continued)	
e. When onshore and offshore oil and gas pipelines are decommissioned…the pipeline and all related debris shall be removed. f. The existing owner/operator of a pipeline to be decommissioned shall be responsible for all costs related to the decommissioning.	
LU 10.4 State Lands Commission Lease 421. a. The City's intent is that oil production not be recommenced at PRC because of the environmental hazards posed by the resumption of oil production and processing over coastal waters and the impacts to visual resources and recreation at the beach. Unless it is determined that there is a vested right to resume production at PRC 421, the City supports termination of the lease by the CSLC and/or a quitclaim of the lease by the owner/operator. b. If resumption of production is considered for approval, on pier processing of the oil at a site within the tidal zone shall not be approved unless it is demonstrated that there is no feasible and less environmentally damaging alternative to processing on the pier. The development of new processing facilities over the sea would result in an increased and unacceptable level of risk of environmental damage. c. Decommissioning and proper abandonment of S.L. 421 facilities, including the piers and riprap seawall, shall be required concurrent with decommissioning of the EOF or immediately upon termination of S.L. 421. d. Decommissioning work shall include restoration of the site to its natural pre-Project conditions.	The proposed Project would incrementally contribute to an increase in the potential for release of oil into the environment. Under the Project, activities would be largely defined as separation; however, they could also be viewed as processing given the use of means other than gravity to remove water from oil, which is one of the definitions of dehydration, a method of processing. Such processing would appear to be inconsistent with this policy. If Project activities are considered processing then using the EOF for such activities would reduce the potential for a release of oil and therefore reduce the potential for environmental impacts associated with minor releases of oil. Thus, while the proposed recommissioning of PRC 421 may rise consistency issues with this policy, the use of the EOF for processing/ separation would appear to be the alternative most in line with the intent of this policy. PRC 421 facilities are not required to be decommissioned at this time as the use of the EOF has not yet been terminated. If recommissioning PRC 421 is approved, infrastructure and pipelines associated with PRC 421 would then be r decommissioned in approximately 12 years...
LU 10.6 Oil and Gas Production Areas. a. The City shall oppose any new leases in the western Santa Barbara Channel for offshore oil and gas production within State waters and within the waters of the OCS. b. The City shall oppose the construction of any new oil and gas production or processing facilities in the waters offshore of Goleta. c. Upon cessation of production at Platform Holly, the City supports the timely quitclaim of all associated leases, permanent discontinuation of all oil and gas production, and inclusion of all former lease areas into the California Coastal Sanctuary offshore of Goleta and the Santa Barbara County. d. If oil and gas production from new offshore leases or facilities occurs, the new production shall not be processed at the EOF. Any such production shall be transported by pipeline to the nearest consolidated processing facility as defined by the Santa Barbara County's South Coast Consolidation Planning Area policies.	The proposed Project would consist of the recommissioning of existing oil production facilities. Recommissioning the existing structures does not constitute a "new" lease or construction of a new production facility. Under the Project, activities would be primarily defined as separation; however, given that water is removed from oil by means other than gravity, it could also be viewed as processing.
Open Space Element	
OS 1.3 Preservation of existing coastal access and recreation. Goleta's limited Pacific shoreline of approximately two miles provides a treasured and scarce recreational resource for residents of the city, region, and State. Existing public beaches, shoreline, parklands, trails, and coastal access facilities shall be protected and preserved and shall be expanded or enhanced where feasible.	The Project has the potential to lead to short-term disruption of lateral access during initial construction and perhaps during any future repair activities. During the extended 12 years of operation, the proposed Project would continue to disrupt lateral visual access along this section of coasts through the piers and caissons inhibiting or blocking portions of the public's view laterally along the coast. During high tide events, continuation of the Project pier and seawall would inhibit lateral access along this section of coast as higher tides can reach to the base of the seawall rendering lateral access along the beach infeasible during such periods.

Table 4.8-2. Goleta GP/CLUP Policy Summary (continued)

Policy	Relationship to Project
Open Space Element (continued)	
OS 1.4 Minimization of impacts to lateral coastal access. New development, including expansions and/or alterations of existing development, shall be sited and designed to avoid impacts to public access and recreation along the beach and shoreline. If there is no feasible alternative that can eliminate all access impacts, then the alternative that would result in the least significant adverse impact shall be required. Impacts shall be mitigated through the dedication of an access and/or trail easement where the Project site encompasses an existing or planned coastal access way.	The Project has the potential to lead to short-term disruption of lateral access during initial construction and perhaps during future repair activities. During the operation period, the proposed Project would continue to disrupt lateral visual access along this section of coasts through the piers and caissons inhibiting or blocking portions of the public's view laterally along the coast. During high tide events, continuation of the Project pier and seawall would inhibit lateral access along this section of coast as higher tides, particularly during low sand conditions in fall, winter and spring can reach to the base of the seawall rendering lateral access along the beach infeasible during such periods.
Conservation Element	
CE 1.2 Designation of Environmentally Sensitive Habitat Areas. ESHAs include the following resources: a. Creek and riparian areas; b. Wetlands, such as vernal pools; c. Coastal dunes, lagoons or estuaries, and coastal bluffs; d. Beach and shoreline habitats; e. Marine habitats; f. Coastal sage scrub and chaparral; g. Native woodlands and savannahs; h. Native grassland; i. Monarch butterfly aggregation sites, including autumnal and winter roost sites, and related habitat areas; j. Beach and dune areas that are nesting and foraging locations for the Western Snowy Plover; k. Nesting and roosting sites and related habitat areas for various species of raptors; l. Other habitat areas for species of wildlife or plants designated as rare, threatened, or endangered under State or Federal law; and m. Any other habitat areas that are rare or especially valuable from a local, regional, or statewide perspective.	This policy designates areas surrounding the Project as ESHAs, including Bell Canyon Creek and Lagoon, Tecolote Creek, and all areas seaward and landward of the mean high tide line up to the northern edge of the Venoco access road, the boundary of the project area.
CE 1.6 Protection of ESHAs. ESHAs shall be protected against significant disruption of habitat values, and only uses or development dependent on and compatible with maintaining such resources shall be allowed within ESHAs or their buffers. The following shall apply: a. No development, except as otherwise allowed by this element, shall be allowed within ESHAs. b. A setback or buffer separating all permitted development from an adjacent ESHA shall be required and shall have a minimum width as set forth in subsequent policies of this element. The purpose of such setbacks shall be to prevent any degradation of the ecological functions provided by the habitat area. c. Public access ways and trails are considered resource-dependent uses and may be located within or adjacent to ESHAs. These uses shall be sited to avoid or minimize impacts on the resource to the maximum extent feasible. Measures— such as signage, placement of boardwalks, and limited fencing or other barriers—shall be implemented as necessary to protect ESHAs. d. The following uses and development may be allowed in ESHAs or ESHA buffers only where there are no feasible, less environmentally damaging alternatives and will be subject to requirements for MMs to avoid or lessen impacts to the maximum extent feasible: (1) public road crossings, (2) utility lines, (3) resource restoration and enhancement projects, (4) nature education, and (5) biological research.	Recommissioning PRC 421 would incrementally increase to the potential for oil spills from the project site and larger spills from the EMT. Such spills have the potential to create unavoidable and significant impacts to ESHAs near the Project site.

Table 4.8-2. Goleta GP/CLUP Policy Summary (continued)

Policy	Relationship to Project
Conservation Element (continued)	
e. If the provisions herein would result in any legal parcel created prior to the date of this plan being made unusable in its entirety for any purpose allowed by the land use plan, exceptions to the foregoing may be made to allow a reasonable economic use of the parcel. This use shall not exceed a development footprint of 20 percent of the parcel area and shall be subject to approval of a conditional use permit. Alternatively, the City may establish a program to allow transfer of development rights for such parcels to receiving parcels that have areas suitable for and are designated on the Land Use Plan map for the appropriate type of use and development. f. Any land use, construction, grading, or removal of vegetation that is not listed above is prohibited.	
CE 6.2. Protection of Marine ESHAs. The following protections shall apply to marine ESHAs: a. Marine ESHAs shall be protected against significant disruption of habitat values, and only uses dependent on such resources, such as fishing, whale watching, ocean kayaking, and similar recreational activities, shall be allowed within the offshore area. b. All existing oil and gas production facilities, including platform Holly and the piers at PRC 421, shall be decommissioned immediately upon termination of production activities. All facilities and debris shall be completely removed and the sites restored to their prior natural condition as part of the decommissioning activities. No new oil and gas leases or facilities shall be allowed within State waters offshore from Goleta. c. Permitted uses or developments shall be compatible with marine and beach ESHAs. d. Any development on beach or ocean bluff areas adjacent to marine and beach habitats shall be sited and designed to prevent impacts that could significantly degrade the marine ESHAs. All uses shall be compatible with the maintenance of the biological productivity of such areas. Grading and landform alteration shall be limited to minimize impacts from erosion and sedimentation on marine resources. e. Marine mammal habitats, including haul-out areas, shall not be altered or disturbed by development of recreational facilities or activities, or any other new land uses and development. f. Near-shore shallow fish habitats and shore fishing areas shall be preserved and, where appropriate and feasible, enhanced. g. Activities by the CDFG; Central Coast RWQCB; CSLC; and Division of Oil, Gas and Geothermal Resources to increase monitoring to assess the conditions of near-shore species, water quality, and kelp beds, and/or to rehabilitate areas that have been degraded by human activities, such as oil and gas production facilities, shall be encouraged and allowed.	The proposed Project entails recommissioning PRC 421 and is not considered a new facility or lease; PRC 421 is considered a legally non-conforming entity by the Goleta GP/CLUP. The proposed Project reduces impacts to marine ESHA through MMs designed to reduce impacts to water quality and biological resources. However, recommissioning PRC 421 would incrementally increase the potential for oil spills from the project site and larger spills from the EMT. Such spills have the potential to create unavoidable and significant impacts to ESHAs near the Project site. Decommissioning of PRC 421 would be reviewed under a future application which would require all facilities to be removed.
CE 7.3 Protection of Beach Areas. Access to beach areas by motorized vehicles, including off-road vehicles, shall be prohibited, except for beach maintenance and emergency response vehicles of public agencies. Emergency services shall not include routine vehicular patrolling by private security forces. Any beach grooming activities shall employ hand-grooming methods, and mechanical beach grooming equipment and methods shall be prohibited. All vehicular uses on beach areas shall avoid ESHAs to the maximum extent feasible.	The Project would entail utilizing construction equipment in beach areas to conduct repairs to the caisson wall of Well 421-2 and to install the new drilling equipment. Such construction would be performed in a manner to minimize impacts to beach resources.

Table 4.8-2. Goleta GP/CLUP Policy Summary (continued)

Policy	Relationship to Project
Visual and Historic Resources Element	
VH 1.1 Scenic Resources. An essential aspect of Goleta's character is derived from the various scenic resources within and around the city. Views of these resources from public and private areas contribute to the overall attractiveness of the city and the quality of life enjoyed by its residents, visitors, and workforce. The City shall support the protection and preservation of the following scenic resources: a. The open waters of the Pacific Ocean/Santa Barbara Channel, with the Channel Islands visible in the distance; b. Goleta's Pacific shoreline, including beaches, dunes, lagoons, coastal bluffs, and open costal mesas; c. Goleta and Devereux Sloughs; and d. Creeks and the vegetation associated with their riparian corridors.	The Project piers and caissons constitute a visually incongruous element in this otherwise undeveloped open space area. However, these facilities have been in existence for over 70 years and are part of the existing visual environment. During the operation period, the proposed Project would continue to disrupt foreground lateral visual access along this section of coasts through the piers and caissons inhibiting or blocking portions of the public's view laterally along the coast. Such disruption affects viewers for several hundred feet along this section of scenic coast.
VH 1.3 Protection of Ocean and Island Views. Ocean and island views from public viewing areas shall be preserved. View preservation associated with development shall be accomplished first through site selection and then by use of design alternatives that enhance rather than obstruct or degrade such views. To minimize impacts to these scenic resources and ensure visual compatibility, the following development practices shall be used, where appropriate: a. Limitations on the height and size of structures; b. Limitations on the height and use of reflective materials for exterior walls (including retaining walls) and fences; c. Clustering of building sites and structures; d. Shared vehicular access to minimize curb cuts; e. Downcast, fully shielded, full cut off lighting of the minimum intensity needed for the purpose; f. Use of landscaping for screening purposes and/or minimizing view blockage as applicable; and g. Selection of colors and materials that harmonize with the surrounding landscape.	Development of the proposed Project would not degrade views of the ocean or islands and the facilities have been in place since 1928 and are part of the current visual setting. Further, proposed improvements are designed to be subservient to the existing structures and to minimize visual impacts, including the avoidance of the use of night lighting and the clustering of equipment on the caisson structures and the submersible pump. In addition, the re-installment of storage tanks on top of Pier 421-1 for water and gas re-injection purposes may add to visual obstruction of the facilities from the public view shed.

Source: City of Goleta 2006c.

City of Goleta Coastal Zoning Ordinance

The city of Goleta Coastal Zoning Ordinance is the tool used to implement the policies of the Goleta GP/CLUP. This ordinance has not yet been updated by the newly incorporated city and largely mirrors the existing County Coastal Zoning Ordinance, Article II. Article II restricts the location and type of development permissible within the city. The following provisions are most applicable to the proposed Project (City of Goleta 2006b):

- **Section 35-61: Beach Development.** Prohibits permanent above-ground structures on the dry sandy beach except facilities necessary for public health and safety, such as lifeguard towers, or where such restriction would cause the inverse condemnation of the lot by the county. This section also requires all new development between the first public road and the ocean to grant lateral

easements to allow for public access along the shoreline. In coastal areas, where the bluffs exceed 5 feet in height, the lateral easement shall include all beach seaward of the base of the bluff.

- **Section 35-89: Recreation District.** This district provides open space for various forms of outdoor recreation of either a public or private nature. The intent is to encourage outdoor recreational uses which will protect and enhance areas which have both active and passive recreation potential because of their beauty and natural features. No permits for development including grading shall be issued except in conformance with an approved Final Development Plan, as provided in Sec. 35-174 (Development Plans), and with Sec. 35-169 (Coastal Development Permits).

- **Section 35-160, Nonconforming Structures and Uses, Purpose and Intent.** This section permits nonconformities until they are removed, but does not encourage their survival.

- **Section 35-174: Development Plans.** No permit shall be issued for any development, including grading, for any property subject to the provisions of this section until a Preliminary and/or Final Development Plan has been approved.

The UCSB Long Range Development Plan

The primary purpose of the 1990 LRDP of the UCSB is to guide the physical development of the Campus and enable UCSB to achieve the academic goals set forth in the 1959 Academic Planning Statement. The LRDP is also intended to respond to the provisions of the California Coastal Act of 1976 with respect to the preparation of the LRDP for Campuses in the Coastal Zone. The 2006 Amendment to the LRDP, as certified by the CCC, proposes to convert the 17-5 acre land parcel currently occupied by the EMT into open space when the EMT lease expires in 2016. The leased area would provide a more continuous open space area to allow passive recreation opportunities and beach access to the public.

4.8.3 Significance Criteria

Land use and recreational impacts will be considered significant if the Project would result in:

- Conflicts with adopted land use plans, policies, or ordinances, including the Coastal Act and Goleta GP/CLUP and zoning ordinance;

- Conflicts with planning efforts to protect the recreational resources of the Project area;

- Incompatible adjacent land uses as defined by planning documentation; or

- Residual impacts on sensitive shoreline lands, and/or water and non-water recreation due to a release of oil.

4.8.4 Impact Analysis and Mitigation

The proposed Project could create short-term episodic impacts to public recreation due to disruption of ongoing recreational activities. These would be considered insignificant due to their short term nature (3-6 months) and because the project contains BMPs (roping off construction areas, directing beach users around the site, removal of equipment from the beach) which would ensure that recreation activities are not unduly disrupted during construction.

Impact LU-1: Conflicts with Goleta GP/CLUP Policies

Offshore processing or separation of oil produced at PRC 421-2 and re-injection of produced water and gas at 421-1 would increase the potential for accidental releases of oil into the environment and potentially conflict with policies contained within the Goleta GP/CLUP Land Use, Open Space, or Conservation Elements (Significant, Class I).

Impact Discussion

Implementation of the proposed Project, particularly the potential for impacts resulting from the accidental release of oil into the environment, would conflict with several policies of the Goleta GP/CLUP. Potential conflicts would center on whether Project activities would be defined as separation or processing by the city. Project activities would involve separating oil from water and gas at Pier 421-2 through the use of centrifugal force. The definition of separation in the city's zoning ordinance includes all activities at the drill site necessary to separate oil, water, and gas by gravity, or pressure. Processing activities are defined as involving the chemical separation of oil and gas constituents and the removal of impurities. Processing activities would include oil stripping; H_2S and carbon dioxide removal systems; depropanizers, debutinizers, or other types of fractionation; sulfur recovery plants; wastewater treatment plants; and separation and dehydration of oil/gas/water. Based on these definitions, the proposed activities at PRC 421-2 have elements of both separation and processing and as such, may require a limited exception determination. Project activities are most closely aligned with separation as oil, water, and gas are separated by force; however, they could be considered processing as well since it involves removing water from oil by means other than gravity, which is one of the definitions of dehydration, a method of processing.

Policy LU 10.1: Oil and Gas Processing Facilities. This policy details city support for county policies regarding consolidation of oil and gas processing in the South Coast Consolidation Planning Area at Las Flores Canyon in the unincorporated area west of Goleta. This policy prohibits the permitting of new oil and gas processing facilities in Goleta. If PRC 421 is determined to include processing, the Project and its potential for small incremental releases of oil into the environment may potentially conflict with this policy as processing activities would take place outside the designated consolidation area.

Policy LU 10.4: State Lands Commission Lease 421. This policy states that the city does not support recommissioning oil production at PRC 421 due to the environmental hazards posed by the resumption of oil production and processing over coastal waters and the impacts to visual resources and recreation at the beach. The city supports termination of the lease by the CSLC and/or a quit-claim of the lease by the owner/operator unless it is demonstrated that vested rights exist.

Recommissioning of oil production at PRC 421, production and processing at Pier 421-1 and re-injection at Pier 421-1 would increase the potential for oil spills from the project site (caissons, pipeline). Further, the proposed Project may raise further conflicts with this policy as it also states that the city policy specifically prohibits on-pier processing of the oil at sites within the tidal zone and prohibits approval of such projects unless it is demonstrated that there is no feasible and less environmentally damaging alternative to processing on the pier. As discussed above, while the cyclonic technology proposed for use on PRC 421-2 most closely aligns with the definition of separation contained in the city's zoning ordinance, it also has elements or aspects which may be considered as processing. Therefore, impacts are significant (Class I).

Mitigation Measures

Implementation of those measures identified in Sections 4.1, Geological Resources; 4.2, Safety, 4.3 Hazardous Materials; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, and 4.7, Terrestrial Biological Resources, for protection of the proposed oil separator, reinforcement of caisson containment walls, and contingency planning and spill response would reduce oil spill impacts; however, there are no MMs available to mitigate potential for policy conflicts with the Goleta GP/CLUP.

Rationale for Mitigation

See cited Sections.

Residual Impacts

The potential for small spills from primary project facilities (caisson, pipelines) can be reduced to a less than significant level with application of MMs. However, even with implementation of MMs for oil spill impacts, land- and water-related recreational uses may be impacted from large spills and impacts would remain significant. Further, there are no MMs available to address potential conflicts with Goleta's adopted GP/CLUP; therefore, this impact would remain significant.

Impact LU-2: Oil Releases Could Affect Recreational Activities

High-quality recreational resources are located within the area and could be impacted by the spread of oil from an accidental release from surf zone production activities at PRC 421-2, associated pipelines, transport via barge Jovalan, transportation by pipeline to Las Flores Canyon, or by trucking to the ROSF. Shoreline and water-related uses would be disrupted by oil on the shoreline and in the water and would result in significant impacts to on- and off-shore public recreation (Significant, Class I).

Impact Discussion

Impacts from accidental oil releases could preclude the use of beach areas and associated recreational activities. The degree of impact is influenced by many factors including, but not limited to, spill location, spill size, type of material spilled, prevailing wind and current conditions, the vulnerability and sensitivity of the resource, and response capability.

Spill risk is addressed in Section 4.2, Safety. The greatest risk of spills occurs at the barge Jovalan and at Pier 421-2, where small spills could occur during normal operations, as well as from leaks at pipe fittings and valves. The capability to immediately respond and deploy appropriate containment booming would also influence the extent of affected area. Response capability is analyzed in Section 4.2, Safety.

As discussed above, the Project area provides high quality recreational opportunities for the local residents and tourists. Shoreline and water-related uses would be disrupted by oil on the beach and in the water. While not readily quantifiable, it is clear that a coastal spill could significantly affect coastal recreation and tourism, resulting in lost

commercial recreation and tourism revenues. Sections 4.1, Geological Resources; 4.3, Hazardous Materials; 4.4, Air Quality; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, 4.7, Terrestrial Biological Resources; 4.12, Aesthetic/Visual Resources; and 4.13, Cultural, Historical, and Paleontological Resources all discuss in detail the effects of a spill on the local environmental resources.

Because it is impossible to predict with any certainty the potential consequences of spills, impacts are considered to be significant (Class I), because severe spills could have residual impacts that could affect the beach and recreational uses.

Mitigation Measures

Implementation of those measures identified in Sections 4.1, Geological Resources; 4.2, Safety, 4.3 Hazardous Materials; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, and 4.7, Terrestrial Biological Resources, for protection of the proposed oil separator, reinforcement of caisson containment walls, and contingency planning and spill response.

Rationale for Mitigation

See cited Sections.

Residual Impacts

Even with implementation of MMs for oil spill impacts, land- and water-related recreational uses may be impacted from large spills and impacts would remain significant.

Impact LU-3: Oil Releases from PRC 421-2 and Barge Jovalan Could Affect Sensitive Area Resources and Raise Consistency Issues with Adopted Policies.

Spills that reach the shore along sensitive land use areas or heavily used areas, including recreational areas, would limit or preclude such uses and result in significant adverse impacts (Significant, Class I).

Impact Discussion

Depending on spill size and location, a spill could affect sensitive resources in the area including ESHAs and sensitive species. Conflicts with the Goleta GP/CLUP Conservation Element Policy would result from an oil spill impacting such resources.

Specific to the proposed Project, Policy CE 1.2 designates all marine areas offshore from Goleta extending from the mean high tide line seaward to the outer limit of State waters and all areas extending from the mean high tide line landward to the top of the ocean bluffs as ESHAs, as well as Tecolote Creek and Lagoon, Bell Canyon Creek and Lagoon, Sandpiper Golf Course pond, and Devereux Creek. Therefore, the vast majority of the immediate Project site and several key nearby resources are designated as ESHAs. An oil spill from the proposed Project could impact these resources and violate the intentions of several Conservation Element policies including CE 1.6, Protection of ESHAs, CE 6.2, Protection of Marine ESHAs, and CE 7.3, Protection of Beach Areas.

Spills that reach the shore would damage existing resources and would result in significant adverse impacts (Class I). Sections 4.1, Geological Resources; 4.4, Air Quality; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, 4.7, Terrestrial Biological Resources; 4.12, Aesthetic/Visual Resources; and 4.13, Cultural, Historical, and Paleontological Resources all discuss in detail the effects of a spill on coastal environmental resources.

Because it is impossible to predict with any certainty the potential consequences of spills, impacts are considered to be significant since severe spills, such as those that could occur from barge Jovalan, could have residual impacts that could affect the beach and/or recreational uses (Class I).

Mitigation Measures

Implementation of those measures identified in Sections 4.2, Safety; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, and 4.7, Terrestrial Biological Resources, for protection of the proposed oil separator, reinforcement of caisson containment walls, and contingency planning and spill response.

Rationale for Mitigation

See cited Sections.

Residual Impacts

Even with implementation of MMs for oil spill impacts, sensitive coastal biological and water resources may be impacted from large spills and impacts would remain significant.

Impacts Related to Future Transportation Options

For the purposes of this safety analysis, it is assumed that Line 96 and the EMT would be used to transport crude oil recovered from PRC 421 using the barge Jovalan to ship the oil to a Los Angeles or San Francisco Bay area refinery through approximately the year 2013. However, as discussed earlier in this EIR (Sections 1.2.4, 2.4.2, and 3.3.6), several options exist for future transportation of oil from the Project, each with different potential safety impacts. These include ongoing use of the EMT through 2013, use of a pipeline to Las Flores Canyon, and trucking of oil to Venoco's ROSF Facility 35 miles to the south and subsequent transport to Los Angeles via pipeline. The potential safety impacts from transportation using the existing EMT system are fully described above (see Impacts LU-1 through LU-3).

However, because the timing and exact mode of transportation of produced oil after the initial five years of Project operation are speculative at this point in time, the potential impacts of use of a pipeline or trucking are only briefly summarized here and are fully disclosed as part of the alternatives analysis (Section 4.2.5, Transportation Sub-Alternative Options). If none of these options is permitted or available by the cessation of operation of the EMT, production from PRC 421 would be stranded, at least temporarily, until an alternative transportation mode is approved and becomes available.

Transportation of oil through an 8.5-mile pipeline from the EOF to the AAPL at Las Flores Canyon could create potential impacts through an increased potential for spills from such a pipeline. Although the timing of construction of the new pipeline is uncertain and is currently under review as part of the proposed Full Field Development Project, transportation of oil via pipeline could commence as early as 2009 or 2010, resulting in 10 or more years of transportation by pipeline. Although the chance of a spill or release exists, pipelines are the safest method available for the transportation of crude oil. Further, the new 8.5-mile long proposed pipeline would be equipped with state of the industry safety measures, including cathodic protection against corrosion and "smart pigging" capabilities. These new state of the industry construction and safety features, when combined with the limited 12 year operating horizon would reduce the potential for pipeline spills to insignificance (See Impact S-12).

Future transportation of oil via a combination of trucking for 35 miles from the EOF to the ROSF and via existing pipeline south to Los Angeles would incrementally increase the potential for spills. However, under the proposed Project, trucking would commence no earlier than 2013, and would involve not more than 2 trucks per day carrying 160

barrels of oil each, declining to 1 truck per day in the later years of Project operation (see Section 3.3.6, Transportation Sub-Alternative Options, Table 3-2). Based upon the projected frequency of trucking and the distances traveled, shipment of oil via trucking would not be expected to create significant Land Use impacts due to the insignificant potential for spill related accidents to occur. Similarly, the shipment of oil via existing pipeline which already transports substantial amounts of crude oil would not be expected to measurably increase safety impacts as the failure rate for such pipelines is a function of pipeline length rather than increased throughput. The pipelines would not be modified by the addition of PRC 421 crude oil; therefore, the spill frequencies for the respective pipeline would be unchanged by the proposed Project.

Table 4.8-3. Summary of Land Use and Recreation Impacts and Mitigation Measures

Impact	Mitigation Measures
LU-1: Conflicts with Goleta GP/CLUP Policies	Implementation of those measures identified in Sections 4.1, Geological Resources; 4.2, Safety, 4.3 Hazardous Materials; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, and 4.7, Terrestrial Biological Resources.
LU-2: Oil Releases Could Affect Recreational Activities	Implementation of those measures identified in Sections 4.1, Geological Resources; 4.2, Safety, 4.3 Hazardous Materials; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, and 4.7, Terrestrial Biological Resources.
LU-3: Oil Releases from PRC 421-2 and Barge Jovalan Could Affect Sensitive Area Resources and Raise Consistency Issues with Adopted Policies	Implementation of those measures identified in Sections 4.1, Geological Resources; 4.2, Safety, 4.3 Hazardous Materials; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, and 4.7, Terrestrial Biological Resources.

4.8.5 Impacts of Alternatives

No Project Alternative

Under the No Project Alternative, Venoco would not recommission PRC 421, the wells would be shut-in and supporting infrastructure would eventually be decommissioned and either removed or left in place. PRC 421 is a legal non-conforming use; therefore, as a result of decommissioning the structures, long-term impacts to Land Use, Recreation, and Planning under the No Project Alternative would be eventually beneficial as the area would be restored to its natural state. A more rapid

decommissioning of PRC 421 would reduce Land Use impacts as it would be more consistent with the intent of city of Goleta policies.

However, until the PRC 421 is fully abandoned, potentially significant impacts could occur though collapse of portions of either of the caissons, particularly the seaward facing wall of PRC 421-2 which has not been repaired, which would result in impacts similar to those of the proposed project (see Impacts LU-1, LU-2, S-2). In addition, while damage to sections of the aging timber bulkhead or under-engineered portions of the seawall protecting this bulkhead could be of concern due to the possible release of potentially contaminated soil into the surf, impacts would be less than those identified for the proposed Project as damage to the existing 6-inch flow line would not have the potential to release oil or produced water into the environment (see Impact S-3). Potential impacts associated with damage to the existing caissons, seawall and access road under this alternative would be mitigated by expedited abandonment as set forth in MM S-11.

Finally, as noted in Section 2.1.1, the CSLC has concerns about the potential for pressure to build up in the reservoir, causing oil to escape from wells that were abandoned in the 1940s and 1950s. This concern is based on observations following the 1994 shut-in of the PRC 421 wells.

Although the possible releases of oil from previously abandoned wells do not pose direct safety or hazard conditions, the potential for unquantified and uncontrolled releases is of concern, particularly because the releases would directly impact marine waters and coastal habitats. Based upon the thresholds identified in this EIR, any such release of oil into the environment could create potentially significant indirect impacts to affected marine, near shore and estuarine environments similar to those identified in Impact LU-3. However, insufficient data exist to quantify the actual potential for such leaks to occur, their exact location or the size of such leaks; therefore it would be speculative to identify either the frequency or potential severity of such impacts at this time.

No Project Alternative with Pressure Testing

Under the No Project Alternative with Pressure Testing, temporary production facilities and equipment would be installed at PRC 421 in order to allow for temporary oil production to permit flow pressure testing of the existing 421-2 well and the associated reservoir. Flow pressure testing would commence for a period of 6 to 12 months in order to determine the potential of possible pressure increases in the reservoir upon

permanent closure of the well at PRC 421. After testing is completed, recommendations would be provided on the ultimate disposition of the surf-zone facilities. At that time, the CSLC would also make an appropriate decision concerning the repressurization of the reservoir. The potential for an oil spill would be reduced under this Alternative given the reduced production time; however, it is not eliminated. Therefore, impacts to Land Use, Recreation and Planning would remain significant with implementation of this Alternative.

Onshore Oil Separation at the EOF

Under this Alternative, crude produced at PRC 421 would be piped to the EOF for separation and the crude would be commingled with production from Platform Holly, while produced water would be disposed of at well WD-1 located at the EOF. Given that the separation and processing systems at the EOF are not separate systems, under this Alternative oil produced from the Project would undergo both separation and processing. This Alternative could raise potential issues with the Goleta GP/CLUP Land Use Element Policy 10.1 which discourages continuation or expansion of activity at the EOF. The objective of this policy is to promote the discontinuation of onshore processing and transport facilities for oil and gas within the city, the removal of unused or abandoned facilities, and the restoration of areas affected by existing or former oil and gas facilities within the city. This Alternative would contribute to extending the life of the EOF, contrary to the intent of city policy to phase out oil production and processing within city limits. However, within the hierarchy of Goleta's policies, the benefits of this Alternative in avoiding the potential for surf zone spills associated with processing at Pier 421-2 would substantially increase consistency with Land Use Element Policy 10.4 and outweigh issues associated with use of the EOF (see below).

However, Policy LU 10.4 states that if production is resumed at PRC 421, on-pier processing of the oil at a site within the tidal zone shall not be approved unless it is demonstrated that there is no feasible and less environmentally damaging alternative to processing on the pier. The development of new separation-processing facilities over the sea would result in an incremental increase in the potential for minor releases of oil and associated risk of environmental damage. Processing at the EOF would have reduced environmental impacts associated with it for several reasons. The EOF is a currently operating industrial facility, while PRC 421 is located in an ESHA. An oil spill at the EOF would be easier to contain given this facilities onshore location and the proximity to spill containment equipment and personnel. An oil spill at the EOF could potentially impact marine resources if the spill entered the creek and flowed to the

ocean; however, any oil spill at PRC 421 would likely immediately impact marine sources. Further, the pier and caisson structures of PRC 421 date back to 1928 with associated potential structural integrity issues, while the EOF is a more modern facility with modern spill containment technology. Expedited decommissioning of Pier 421-1 under this Alternative would reduce risks associated with injection and possible spills at this facility. Finally, if necessary, the separation and processing of oil at EOF could potentially be permitted under the limited exception provisions of the city's zoning ordinance if the resumed production at PRC 421 is approved by CSLC, as minimal physical modifications to the EOF would be required and the separation-processing of oil onshore would be environmentally preferable to such activities occurring offshore.

The potential for a release of oil or wastewater under this Alternative is less than that associated with the proposed Project; however, impacts LU-1, LU-2, and LU-3 would still apply. Mitigation measures in sections 4.1, Geological Resources; 4.2, Safety, 4.3, Hazardous Materials, 4.4, Air Quality; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources, 4.7, Terrestrial Biological Resources; 4.12, Aesthetics/Visual Resources; and 4.13, Cultural, Historical, and Paleontological Resources would still apply; however, impacts to Land Use would remain significant.

Recommissioning Using Historic Production Methods

Under this Alternative, production would resume at PRC 421 in its historic configuration at the time prior to the wells being shut-in in 1994 while incorporating new technologies to comply with current industrial and environmental standards. This Alternative would have potentially greater impacts to the environment and Impacts LU-1, LU-2, and LU-3 would still apply. However, although risk of spills would remain significant, using historic (free-water knock-off) separation technology could theoretically be more consistent with adopted city policy as this technology is clearly not processing. However, the use of such dated technology may carry incrementally higher risks of small spills occurring, which would directly conflict with the intent of city policy. Mitigation measures in Sections 4.1, Geological Resources; 4.2, Safety; 4.3, Hazardous Materials; 4.4, Air Quality; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources; 4.7, Terrestrial Biological Resources; 4.12, Aesthetics/Visual Resources; and 4.13, Cultural, Historical, and Paleontological Resources would still apply; however, impacts to Land Use would remain significant.

Re-injection at Platform Holly

Under this Alternative, all aspects of the Project would remain the same with the exception that Pier 421-1 would be decommissioned and produced water would be transported via the existing 4" pipeline to Platform Holly and re-injected offshore rather than at 421-1. This would also include minor equipment improvements at Holly to permit use of annulus gas for fuel (see Section 4.2, Safety). All other aspects of the proposed Project would be the same. Similar to the Onshore Separation at the EOF Alternative, this Alternative would expedite decommissioning of Well 421-1. Therefore, impacts to Land Use would be reduced as PRC 421 would be partially decommissioned under this Alternative and the area occupied by this Pier and Caisson restored. However, MMs in Sections 4.1, Geological Resources; 4.2, Safety; 4.3, Hazardous Materials; 4.4, Air Quality; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources; 4.7, Terrestrial Biological Resources; 4.12, Aesthetics/Visual Resources; and 4.13, Cultural, Historical, and Paleontological Resources would still apply.

Transportation Sub-Alternative Options

Under these sub-alternative options, oil would not be sent to Barge Jovalan for delivery to refineries. Instead, oil would either be transported to the AAPL at Las Flores Canyon by a newly constructed pipeline (Figure 3.1) or oil would be transported via truck to the ROSF, located east of Carpinteria. Each of these transportation sub-alternative options would create the similar impacts to Land Use as discussed in LU-1 and LU-2 above. However, shipment of oil via pipeline would have substantially lower land use impacts than those of the proposed project as it would be consistent with adopted policy and have lower potential for accidental release of oil. In addition, while truckling of oil could create potential land use conflicts with adopted city and County policies, these would not be considered as significant impact as the potential for oil spills from shipment via truck has been identified as insignificant (see section 4.2, Safety)

4.8.6 Cumulative Projects Impact Analysis

Impacts from the proposed Project were assessed in conjunction with the cumulative projects identified in Table 3-2.

Impact LU-4: Oil Spills from Vessels in Transit along the Coast

Impacts to sensitive shoreline lands, and/or water and non-water recreation due to a release of oil would result in potentially significant impacts. When the

cumulative environment is considered, the contribution from the proposed Project could be significant (Class I).

Impact Discussion

The risk of an oil release associated with operation of the proposed Project would contribute to impacts to the cumulative environment given increased demand for the transportation of oil. Over the lifetime of the Project, this increase would add an incremental increase in spill risk and oil spill risks to land uses and recreational uses would be associated with that increase. Other projects would contribute to the spill risk, exacerbating an already significant impact. When the cumulative environment is considered, the contribution from the proposed Project adds to the cumulative risks of an oil spill. Impacts to sensitive shoreline lands, and/or water and non-water recreation due to a release of oil would remain potentially significant (Class I).

Mitigation Measures

Implementation of those measures identified in Sections 4.2, Safety; 4.5, Hydrology, Water Resources, and Water Quality; 4.6, Marine Biological Resources; and 4.7, Terrestrial Biological Resources, for protection of the proposed oil separator, reinforcement of caisson containment walls, and contingency planning and spill response would be required.

Rationale for Mitigation

See cited Sections.

Residual Impacts

Impacts would remain significant.